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UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

REBECCA ALLISON GORDON, JANET AMELIA  
 ADAMS and AMERICAN CIVIL LIBERTIES UNION  
 FOUNDATION OF NORTHERN CALIFORNIA,

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION, et al.,

Defendants.

)  
 )  
 )  
 ) Case No. C-03-1779 CRB  
 )  
 ) **STIPULATION OF**  
 ) **COMPROMISE AND**  
 ) **SETTLEMENT OF**  
 ) **PLAINTIFFS' CLAIM**  
 ) **FOR ATTORNEYS' FEES**  
 ) **AND COSTS AND**  
 ) ~~**PROPOSED ORDER**~~

Stipulation of Compromise and Settlement of Claim for  
 Attorneys' Fees and Costs, Case No. C-03-1779 CRB

1 Subject to approval of the Court, plaintiffs Rebecca Allison Gordon, Janet Amelia Adams  
2 and American Civil Liberties Union Foundation of Northern California, and Defendants Federal  
3 Bureau of Investigation (FBI), Department of Justice and Transportation Security Administration  
4 (TSA) hereby stipulate and agree as follows:  
5

6 1. On June 29, 2005, this Court entered in the above-captioned matter a judgment in  
7 favor of plaintiffs in part and in favor of defendants in part under the Freedom of Information  
8 Act, 5 U.S.C. § 552.  
9

10 2. On October 24, 2005, the Court signed a Stipulation and Order which enlarged the  
11 time for plaintiffs to file a motion for attorneys' fees until January 15, 2006.

12 3. The parties have now reached an agreement to compromise and settle all claims  
13 against defendants for attorney's fees, costs and expenses in this litigation for \$200,000.00, which  
14 amount shall be paid by the United States to the American Civil Liberties Union Foundation of  
15 Northern California, 1663 Mission Street, Suite 460, San Francisco, California 94103.  
16

17 4. Payment of the amount described in paragraph 3 of this Stipulation shall  
18 constitute full satisfaction of any and all obligations of the United States for attorney's fees, costs  
19 and expenses in this litigation under 5 U.S.C. § 552(a)(4)(E) and any other provision of law  
20 authorizing an award of attorney's fees and costs. In consideration of the payment described in  
21 paragraph 3 above, plaintiffs, and each of them, hereby waive, forego, and forever discharge the  
22 United States, the United States Department of Justice, the Federal Bureau of Investigation, the  
23 United States Department of Homeland Security, the Transportation Security Administration,  
24 and their agents, employees, successors and assigns, from any and all liability for attorney's fees,  
25  
26  
27  
28

1 litigation costs, or any other expenses of any kind that have been or may be incurred in  
2 connection with this litigation.

3  
4 Dated: January 18, 2006

5 AGREED:

6  
7 THOMAS R. BURKE  
8 SUSAN E. SEAGER  
9 DAVIS WRIGHT TREMAINE LLP

PETER D. KEISLER  
Assistant Attorney General

KEVIN V. RYAN  
United States Attorney

10 ALAN L. SCHLOSSER  
11 AMERICAN CIVIL LIBERTIES UNION  
12 FOUNDATION OF NORTHERN CALIFORNIA

ELIZABETH J. SHAPIRO  
JOSEPH W. LOBUE  
U.S. DEPARTMENT OF JUSTICE

13 By: 

By: 

14 Attorneys for Plaintiffs Rebecca Allison Gordon,  
15 Janet Amelia Adams, and American Civil Liberties  
Union Foundation of Northern California

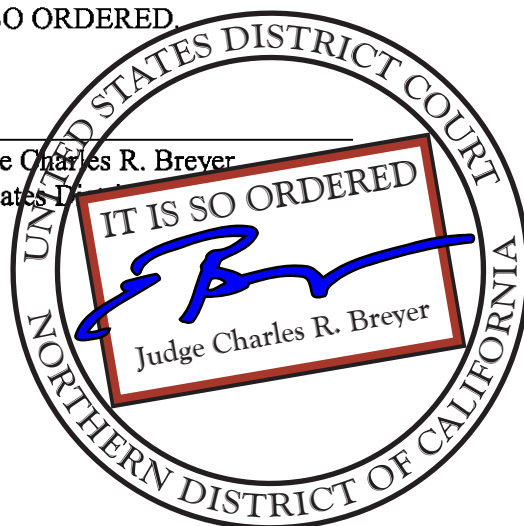
Attorneys for Defendants  
U.S. Department of Justice,  
Federal Bureau of Investigation, and  
Transportation Security Administration

16  
17  
18 ORDER

19 Pursuant to the Stipulation of the parties, it is SO ORDERED.

20  
21 Dated: January 24, 2006

22 Honorable Charles R. Breyer  
23 United States District Judge



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28 Stipulation of Compromise and Settlement of Claim for  
Attorneys' Fees and Costs, Case No. C-03-1779 CRB - 3 -